

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

THOMAS DEXTER JAKES,

*Plaintiff,*

v.

DUANE YOUNGBLOOD;

JOHN DOE 1;

JOHN DOE 2;

JOHN DOE 3;

JOHN DOE 4;

JOHN DOE 5;

JOHN DOE 6;

JOHN DOE 7;

JOHN DOE 8;

JOHN DOE 9; AND,

JOHN DOE 10

*Defendants.*

Civil Action No. 2:24-cv-1608

JURY TRIAL DEMANDED

**COMPLAINT**

Plaintiff Bishop Thomas Dexter (“T.D.”) Jakes, for his complaint against Defendant Duane Youngblood and DOES 1-10, alleges as follows:

**NATURE OF THE ACTION**

1. This lawsuit sounds in the tort of defamation and civil conspiracy to commit defamation.

2. The underlying story in this case depicts a carefully planned effort by a convicted criminal, and those acting in concert with him, to rewrite history in order to deflect blame and accountability for his own reprehensible and criminal conduct and to publicly smear a renowned and eminently respected religious leader in a blatant and explicit attempt to extort him for millions of dollars.

3. This lawsuit is intended to bring that scheme to a halt, to end the extreme emotional, physical, and spiritual toll Defendants' conduct has caused Bishop Jakes, to set the record straight so the world understands the patent falsity of the accusations, and to restore Bishop Jakes's reputation.

### **PARTIES**

4. Plaintiff Bishop T.D. Jakes is a world-renowned spiritual leader, global philanthropist, author, film and music producer, and the founder of The Potter's House Church in Dallas, TX. He is a U.S. citizen and resident of Dallas, TX.

5. Defendant Duane Youngblood is a registered sex offender in the state of Pennsylvania and a two-time convicted felon related to sexual abuse of children. He is a U.S. citizen and a resident of Pittsburgh, PA.

6. On information and belief, Plaintiff alleges that Defendants DOES 1 through 10, inclusive, are other parties not yet identified who have acted in concert and agreement with Youngblood in order to commit defamatory conduct against Plaintiff and have committed acts in furtherance of such wrongdoing. The true names, whether corporate, individual or otherwise, of DOES 1 through 10, inclusive, are presently not fully known to Plaintiff, which therefore sues said Defendants by such fictitious names, and will seek leave to amend this Complaint to show their true names and capacities when same have been ascertained.

7. On information and belief, Plaintiff alleges that at all times relevant hereto each of the Defendants acted in concert and agreement with each other for the objective of intentionally committing defamatory acts against Plaintiff, with full knowledge of all the facts and circumstances, including but not limited to, full knowledge of the violative conduct at issue and the damages to Plaintiff caused thereby.

### **JURISDICTION & VENUE**

8. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C §1332 because there is complete diversity of citizenship among the parties, and the amount in controversy exceeds \$75,000.00, excluding interest.

9. This Court has personal jurisdiction over Defendant Duane Youngblood because he is a citizen of the Commonwealth of Pennsylvania and resides in Allegheny County.

10. Venue is proper in this District because Defendant resides in this District, Defendant is subject to personal jurisdiction in this District, and because a substantial part of the events or omissions giving rise to Plaintiff's claims occurred in this District.

### **FACTUAL ALLEGATIONS**

#### **Bishop T.D. Jakes Becomes One of the Most Prominent and Respected Pastors in the United States, and Establishes One of the Largest Churches in the United States—The Potter's House of Dallas**

11. Bishop Jakes is the visionary, charismatic, and devoted senior pastor of The Potter's House church in Dallas, Texas, which has a global outreach and congregation exceeding 80,000 persons, a motivational speaker, an entrepreneur, a best-selling author of 30 books, a producer of faith-focused music and films, a Grammy award winner, a global humanitarian, and one of the most prominent and well-respected pastors and religious figures in the United States today. In 2009, for example, Bishop Jakes was selected to give the sermon at St. John's Episcopal Church, dubbed "the church of the presidents", across Pennsylvania Avenue from the White House, on the

morning of President Obama's inauguration ceremony.

12. From his humble roots as the pastor for the 10-member storefront church Greater Emanuel Temple of Faith in Smithers, West Virginia in the early 1980s to leading the now-more-than-30,000-member Potter's House Church based in Dallas, Texas he founded in 1996, Bishop Jakes has devoted his life to guiding others towards spiritual prosperity. He has inspired millions all over the world to live purposeful and spiritual lives, and the initiatives he and his organization have developed over the years have helped millions all over the globe.

13. For his countless contributions all over the world, Bishop Jakes has been honored and recognized by some of the most influential global organizations and media outlets. He has been called "America's Best Preacher" by CNN and Time, "perhaps the most influential black leader in America today" by The Atlantic, and regularly appears on lists of the most respected and influential leaders in America. He has been a spiritual advisor for the last three presidents. He is the recipient of numerous prestigious awards, including the NAACP Image Award in 2011.

14. Bishop Jakes has been married to his wife Serita for over 35 years and is a loving husband, father, and grandfather. Throughout his more than forty years in the ministry, Bishop Jakes has maintained a stellar reputation for his faith, morals, ethics, and above all devotion to his family and the local and global communities he has built all over the world.

**Defendant Duane Youngblood Is Convicted On Multiple Occasions For Sex Offenses Involving Minors**

15. In stark contrast, Duane Youngblood is registered as a **lifetime** sex offender in the State of Pennsylvania and is **currently** under supervision by the state's Department of Parole with Parole number 590JF. Youngblood has repeatedly and uncontrollably sexually assaulted young children since at least 2002. On all occasions, Youngblood has pleaded guilty and admitted to his heinous crimes.

16. In 2006, at the time pastor of a church in Homestead, Youngblood was first arrested on charges of sexual assault and corruption of minors and other charges. In that case, he was accused of sexually assaulting a 15-year-old in 2002 while counseling the boy. The teen sought counseling from Youngblood because a cousin had molested him, according to a police affidavit.

17. As part of a plea deal, Youngblood was sentenced to a year of house arrest and seven years of probation. Part of the plea deal prohibited Youngblood from counseling children.

18. Despite this conviction, Youngblood was unsatisfied. In 2014 Youngblood was charged with inappropriately touching two teen victims, in one instance on about 25 occasions while he was counseling the youth between 2009 and 2011. With respect to that victim, counseling sessions in Youngblood's church office began when the victim was 16 years old and ended when the victim was 18 at which point the victim told Youngblood he no longer wanted to participate in counseling, according to the criminal complaint. In another, Youngblood had sexual relations with a youth over a three-week period. Youngblood pleaded guilty and was sentenced to 16 to 48 months in prison in 2015 and three years of probation.

19. Nevertheless, while on parole, Youngblood conspires with others to harm and profit from attacks on prominent black religious figures, including Bishop Jakes, as more fully elaborated herein below.

**Youngblood Uses The Reach Of Larry Reid Live To Publicly Blame His Own Abhorrent And Horrific Sexual Abuse Of Minors On Others, Including Bishop Jakes, By Accusing Them Of Grooming, Molesting, And Sexually Assaulting Him Decades Ago**

20. On October 28, 2024, Youngblood sat for an over-two-hour-long interview on Larry Reid Live (LRL), an online video podcast hosted by Larry Reid that boasts of having over 150,000 subscribers on YouTube alone. The October 28 episode of LRL was broadcast live to tens of thousands of online viewers on the Larry Reid Live YouTube and Facebook accounts. The episode was titled, "Larry Reid Live INTERVIEWS Duane Youngblood: 'The Abused become

the Abuser.’”<sup>1</sup>

21. Youngblood began his interview by misleading viewers about the circumstances of his convictions and incarcerations. Youngblood lied to LRL’s viewers about the circumstances of his 2015 conviction, claiming it was only because he was communicating with minors when he was not allowed to. The actual truth, which Youngblood concealed from the LRL audience, was that he violated his parole not because he had simply communicated with minors when he was not allowed to, but rather because he had been caught inappropriately touching two teen victims during counseling session between 2009 and 2011, and of engaging in sexual abuse over a three-week period with a teenage victim.

22. The interview later turned to Youngblood’s new claim about how the source of his becoming an abuser was his own “abuse” at the hands of pastors and religious figures he encountered in his youth. After detailing instances of his own father sexually abusing his sister and of his abuse at the hands of other church leaders, Youngblood turned his ire on Bishop Jakes.

23. From the moment Youngblood brought up his allegations about Bishop Jakes roughly an hour into the interview, he and Mr. Reid spent almost the entirety of the rest of the interview on Bishop Jakes and Youngblood’s claim that Bishop Jakes tried to groom and sexually abuse him.

24. Youngblood’s story about Bishop Jakes on the October 28 episode of LRL was that when the now 58-year-old Youngblood was “18 or 19 years of age,” Bishop Jakes, after talking to Youngblood for two hours at the home of an elder clergy woman where Bishop Jakes was staying

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<sup>1</sup> Larry Reid Live, 10.28.24 - *Larry Reid Live INTERVIEWS Duane Youngblood: “The Abused become the Abuser”* (“October 28 LRL Episode”), YouTube (Oct. 28, 2024), <https://www.youtube.com/watch?v=DN2Q5hWyeI0>.

while supporting a local church's revival program, wrapped his arms around Youngblood and tried to kiss him:

After sitting there and having this long discourse with him, I finally looked at my watch and I'm like, "oh my goodness, I got to go. I got to get this car back to my mother. She's gonna kill me." So I said to Bishop, "I got to get up." And I got up from the table, ***he got up from the table, he walked around toward the, uh, way I had to exit quicker than I got over there, and when I started to walk past him, he pulled me to himself, wrapped his arms around me, and tried to kiss me.*** And in that moment I literally died.

25. Next, according to Youngblood, Bishop Jakes called Youngblood the following morning:

In the morning, I step into our bathroom and my home phone rings. My mother answers the phone and she says to me, "Duane, it's Elder Jakes." Jakes and I get on that phone and when I get on that telephone, I can hear water. He is sitting in a bathtub and in that thing he says to me, without any hesitation, "there's three things I need you to do. The first one is, when I come to Pittsburgh you're going to be the only person I sleep with. The second one is you can't sleep with anybody else because I don't want to give my wife anything. And thirdly, I will take care of you the rest of your life.

26. Youngblood then went on to describe how he did not tell his mother what happened, but that she made him go to church services that night, where Bishop Jakes not only preached, but called up Youngblood to the pulpit to "read" for him. Youngblood ended his story by claiming that "there is so much more to me and Bishop Jakes and my family and Bishop Jakes and the ***absolute destructive sexual damage***, but this thing was so so extremely damaging."<sup>2</sup>

27. Later on in the October 28 LRL episode, Youngblood described an encounter with Bishop Jakes where, years later, he had to drive Bishop Jakes and his wife to a hotel after a conference. According to Youngblood, he accompanied Bishop Jakes and his wife back to the hotel room, and after Mrs. Jakes went to sleep, Youngblood confronted Bishop Jakes and asked

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<sup>2</sup> *Id.*

him, “Why did you do what you did?” To which Bishop Jakes responded, “My stock was rising, and I would have had sex with anybody at that time.”<sup>3</sup>

28. Less than a week later, on November 3, 2024, Youngblood returned to LRL for “Pt. 2 - Larry Reid Live INTERVIEWS Duane Youngblood: ‘The Abused became The Abuser.’”<sup>4</sup> In part 2, Youngblood doubled down on the same false story, and this time he made sure that all of the LRL viewers knew that he was not just accusing Bishop Jakes of trying to begin a sexual relationship with him, but rather that his story was one of sexual abuse. When pressed by Reid to further describe how his allegation that “Bishop Jakes violated, groomed” him was “predatory” in nature, Youngblood made it clear that he was accusing Bishop Jakes of attempted sexual assault:

When it comes to Bishop Jakes. When I was sharing the story the other day this, I, I'm just running through the story, but I want to make sure people are very clear. I said that we were sitting at a dining room table and I looked at my watch and said I've got to get up and get out of here because I've got to get my mother's car back to her. ***But what may have been misunderstood is that Bishop Jakes got up, came around that table, and positioned himself in the corner that I had to walk past. When I was walking past that corner, he grabbed me.*** There is no reason if you're going to just give me a hug as we're leaving, go to the door with me and let's hug it out and let me go out the door. We are not at the door, we are still in the dining room, and ***he is in the corner, grabbed me to himself, looked down into my face, and then tried to bend his head down to kiss me on my lips.*** That is not a “you didn't get what you wanted to get.”<sup>5</sup>

29. Youngblood then doubled down and described again the phone call he claimed he had with Bishop Jakes, just as he did in the October 28 interview, stating in no uncertain terms that to him, “***that is absolutely forcing your position***, your idea onto that person.”<sup>6</sup>

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<sup>3</sup> *Id.*

<sup>4</sup> Larry Reid Live, 11.3.24 - Pt. 2 - Larry Reid Live INTERVIEWS Duane Youngblood: “The Abused became The Abuser” (“November 3 LRL Episode”), YouTube (Nov. 3, 2024), <https://www.youtube.com/watch?v=6ybOqnFB-UQ>

<sup>5</sup> *Id.*

<sup>6</sup> *Id.*



30. In part 2, Mr. Reid also makes clear exactly what Youngblood was accusing Bishop Jakes of doing, stating at the 39-minute mark that “Bishop Jakes violated, groomed you.” And Youngblood doubled down on his claim that Bishop Jakes “did this” to Youngblood “because his stock was rising and he would have slept with anybody.”<sup>7</sup>

31. For his part, Reid went to great lengths to try and bolster Youngblood’s credibility, claiming in part 2 that Youngblood feels “honest” to Reid, that “it doesn’t feel that you’re mad, you don’t seem mad at all, and you don’t feel like you’re trying to get anybody back. You just telling the story”—to which Youngblood nods and agrees throughout.<sup>8</sup> Youngblood’s intent and motive for making these allegations would be made absolutely clear with his exorbitant financial demand weeks later, as more fully elaborated herein below.

**Youngblood’s Accusations On Larry Reid Live About Bishop Jakes Are False—And He Knew It When He Made Them**

32. From start to finish, Youngblood’s tale of grooming and attempted sexual assault at the hands of Bishop Jakes is patently false. Bishop Jakes never kissed or tried to kiss Youngblood, never cornered him or forced him into any situation (sexual or otherwise), and certainly never told him that he wanted to sleep with him or had any conversation of a sexual nature at all with him. The interactions described by Youngblood during his LRL interviews on October 28 and November 3 never happened—period.

33. Indeed, the very context and nature of Youngblood’s accusation render them unbelievable. Youngblood, having served years for molesting and sexually assaulting minors that he himself was supposed to counsel and mentor through his church, is a desperate attempt to rehabilitate his image and build a new ministry for himself. His playbook is clear: accuse what

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<sup>7</sup> *Id.*

<sup>8</sup> *Id.*

seems to be every other prominent church leader he has ever met of grooming and preying on him, and then blame them for his own criminal predatory conduct after he has been finally released from prison as a two-time convicted felon and lifetime registered sex offender. Indeed, his blatant lies to LRL's viewers about the circumstances of his own convictions and incarcerations are proof that this is all just one big lie to try and rewrite history for his own personal gain.

**Youngblood's October 28 And November 3 Appearances Falsely Targeting And Attacking Bishop Jakes Go Viral**

34. Just as Youngblood hoped, his October 28 and November 3 appearances went viral. Part 1 has over 120,000 views, making it one of the most viewed LRL episodes in history—even though it has been posted for less than a month. And part 2 has garnered over 25,000 views since it was posted on November 3. Moreover, clips featuring Youngblood's false story about Bishop Jakes posted to the Larry Reid Live YouTube account attracted tens of thousands more views.<sup>9</sup>

35. The LRL interviews were also posted to other Larry Reid Live social media accounts, including Facebook, Instagram, and TikTok (where they garnered hundreds of thousands of additional views),<sup>10</sup> as well as to Larry Reid's website, larryreidlive.com, where they tallied even more views.

36. The spread of Youngblood's false allegations, as expected, did not stop with just Larry Reid's social media and online platforms. Predictably and foreseeably, Youngblood's story went viral, being republished, reposted, and commented on by numerous other social media users and influencers. For example, Newsbreak, which boasts over 26 million monthly readers,

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<sup>9</sup> Larry Reid Live, *Duane Youngblood tells Larry Reid Live about his teenage experience with TD Jakes a*, YouTube (Nov. 2, 2024), <https://www.youtube.com/watch?v=L8Zml3McEjk>; Larry Reid Live, *Larry Reid Live: Duane Youngblood recalls Bishop Quandra Wilson Bishop Jakes Bishop Sherman Watkins*, YouTube (Nov. 3, 2024).

<sup>10</sup> See, e.g., <https://www.tiktok.com/@larryreidlive/video/7431051818370698538?lang=en>.

published at least five separate stories on Youngblood's accusations against Bishop Jakes.<sup>11</sup> And Youngblood's false accusations were republished by other YouTubers and TikTok influencers to hundreds of thousands of additional viewers.<sup>12</sup>

37. All told, it's likely that over a million people have been exposed to Youngblood's lies about Bishop Jakes.

**Youngblood Retains An Attorney With A History Of Filing Frivolous Lawsuits Against Prominent Black Celebrities, And Proceeds To Try And Extort Millions From Bishop Jakes**

38. Incredibly, the Defendants' malicious efforts to smear Bishop Jakes' reputation was only part of the plan—prototypically, of course, their motivation was also deeply rooted in immediate financial gain. Days after the second podcast, on information and belief, the Defendants retained a lawyer in New York to represent Youngblood in a blatant attempt at a “money grab.”

39. By letter dated November 15, 2024, a lawyer purporting to represent Youngblood demanded that Bishop Jakes pay Youngblood six million dollars in order to “resolve this matter

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<sup>11</sup> See Jae Infinity, *When Faith Leaders Fall: Examining the Accusations Against T.D. Jakes*, NewsBreak (Nov. 9, 2024), <https://www.newsbreak.com/news/3667614859776-when-faith-leaders-fall-examining-the-accusations-against-td-jakes>; Virginia Blue, *Duane Youngblood shares his allegations against Bishop TD Jakes and other spiritual fathers*, NewsBreak (Nov. 6, 2024), <https://www.newsbreak.com/virginia-s-blue-ridge-voice-1594046/3661493944039-duane-youngblood-shares-his-allegations-against-bishop-td-jakes-and-othe-spiritual-fathers>; Jae Infinity, *BREAKING NEWS: Sexual assault allegations against TD Jakes exposed!*, NewBreak (Nov. 8, 2024), <https://www.newsbreak.com/news/3665999547833-sexual-assault-allegations-against-t-d-jakes-exposed-by-accuser-duane-youngblood-youngblood-claims-he-was-18-at-the-time>; Jae Infinity, *Former Bishop Duane Youngblood Opens Up About Alleged Encounter with Bishop T.D. Jakes*, NewsBreak (Nov. 8, 2024), <https://www.newsbreak.com/the-world-around-jae-and-beyond-1604689/3666252675013-former-bishop-duane-youngblood-opens-up-about-alleged-encounter-with-bishop-t-d-jakes>; Jae Infinity, *Bishops Accused: Youngblood's Shocking Allegations of Grooming and Trips*, NewsBreak (Nov. 10, 2024), <https://www.newsbreak.com/news/3666335984596-bishops-accused-youngblood-s-shocking-allegations-of-grooming-and-trips>.

<sup>12</sup> See, e.g., @monicajohnsonspic, TikTok (Oct. 29, 2024), <https://www.tiktok.com/@monicajohnsonspic/video/7431365515353820458?lang=en>; @icedrick3, TikTok (Oct. 31, 2024), <https://www.tiktok.com/@icedrick3/video/7431978582877932843>.

quickly and privately”; otherwise, Youngblood would bring a lawsuit against Bishop Jakes for sexual assault and harassment.

40. The motivation of the “demand” was clear: pay millions of dollars; otherwise, the podcast strategy and other similar tactics of attempting to publicly harass and shame Bishop Jakes would continue.

41. Fundamentally, federal criminal law punishes blackmail. Anyone who either demands or receives money, or any other valuable thing, under the threat of informing, or as a consideration for not informing, against any violation of U.S. law under 18 U.S.C. §873 is committing a crime.

42. Further, both the Commonwealth of Pennsylvania (18 Pa. C.S. §3923) and federal criminal law (18 U.S.C. §13) punish attempted extortion, such as the “money grab,” which is no different than an old-fashion robbery attempt.

43. Here, the selection of the attorney was part of the scheme because Youngblood needed to obtain counsel who was either familiar with or experienced in tactics to bring sexual assault claims decades old that have no merit and/or have no relief under the law. For example, the same attorney commenced an action in California against the rapper T.I. and his wife Tinny Harris, accusing them of sexually assaulting a woman in 2005. In August 2024, U.S. District Court Judge Sherilyn Peace Garnett dismissed the lawsuit. The rapper stated that these allegations were false and were part of the many salacious allegations put forth in order to extort money from them.

44. The same proverbial playbook is at work here against Bishop Jakes; however, Youngblood miscalculated Bishop Jakes’ inclination to fight back.

**Bishop Jakes Brings This Action To Hold Youngblood Accountable For  
Deliberately Spreading His Manufactured Story Of Sexual Abuse**

45. Youngblood spread knowingly false accusations about one of the most respected and prominent religious figures. And he did so for the most morally corrupt reasons: to rehabilitate his image, explain away his own criminal and horrific sexual conduct, and ultimately to profit significantly.

46. The financial harm Youngblood's knowingly false accusations have caused Bishop Jakes are monumental and devastating. Bishop Jakes has been the spiritual rock for millions of Christians all over the world, particularly in the African American community. Youngblood's viral allegations that Bishop Jakes groomed, preyed on, and sexually abused and assaulted him—then a young minister—have tarnished Bishop Jakes's reputation. Hundreds of thousands—if not more—have seen and heard Youngblood's accusations, and because of the lies Youngblood and his co-conspirators have told to bolster his credibility, those viewers are likely to believe Youngblood's knowingly false story.

47. In addition to and even more devastating than the millions of dollars in reputational harm Youngblood has caused, Youngblood's lies have put in jeopardy the critical philanthropic missions Bishop Jakes spearheads, and has likely impaired significantly the benefits that the recipients of such efforts receive. And Youngblood's intentional and malicious lies have taken a substantial emotional and physical toll on Bishop Jakes. On November 24—the day before he filed this action—Bishop Jakes suffered a medical crisis on stage in the middle of his Sunday service in front of his entire church.<sup>13</sup>

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<sup>13</sup> See ShaCamree Gowdy, *Bishop T.D. Jakes suffers health incident after delivering sermon*, CBS News (Nov. 25, 2024), <https://www.cbsnews.com/amp/texas/news/dallas-pastor-bishop-td-jakes-suffers-medical-emergency-during-sermon/>.

48. Bishop Jakes believes with all his heart that actual victims of sexual abuse should be treated with the utmost respect, kindness, empathy, and sympathy—and that true perpetrators of such abuse should be held accountable for their actions. But that is not the case here. Youngblood has used and abused the might of social media and the legal process to revictimize those he preyed on and harmed and to make knowingly false accusations for his own personal and financial gain. Men like Youngblood must be held accountable for their abuse of the system and for setting back those with legitimate and real allegations of sexual abuse.

49. Bishop Jakes brings this lawsuit to hold men like Youngblood accountable for their shameful acts and to set the record straight.

### **FIRST CLAIM FOR RELIEF**

#### **LIBEL *PER SE* AGAINST DEFENDANT DUANE YOUNGBLOOD**

50. Bishop Jakes repeats, realleges, and incorporates the above paragraphs as though fully set forth herein.

51. On October 28, 2024 and November 3, 2024, Youngblood gave a live interview on the Larry Reid Live show in which he accused Bishop Jakes of grooming him, of sexually assaulting and abusing him, and over other predatory conduct of a sexual nature. The shows were titled, “10.28.24 - Larry Reid Live INTERVIEWS Duane Youngblood: ‘The Abused become the Abuser’” and “11.3.24 - Pt. 2 - Larry Reid Live INTERVIEWS Duane Youngblood: ‘The Abused become the Abuser’” respectively.

52. In addition to general accusations of sexual abuse against Bishop Jakes, the October 28 Larry Reid Live broadcast also includes the following specific statements by Youngblood about Bishop Jakes:<sup>14</sup>

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<sup>14</sup> [October 28 LRL Episode](#).

- After sitting there and having this long discourse with him, I finally looked at my watch and I'm like, "oh my goodness, I got to go. I got to get this car back to my mother. She's gonna kill me." So I said to Bishop, "I got to get up." And I got up from the table, he got up from the table, he walked around toward the, uh, way I had to exit quicker than I got over there, and when I started to walk past him, he pulled me to himself, wrapped his arms around me, and tried to kiss me. And in that moment I literally died.
- Jakes and I get on that phone and when I get on that telephone, I can hear water. He is sitting in a bathtub and in that thing he says to me, without any hesitation, "there's three things I need you to do. The first one is, when I come to Pittsburgh you're going to be the only person I sleep with. The second one is you can't sleep with anybody else because I don't want to give my wife anything. And thirdly, I will take care of you the rest of your life.
- There is so much more to me and Bishop Jakes and my family and Bishop Jakes and the absolute destructive sexual damage, but this thing was so so extremely damaging.

53. And in addition to general accusations of sexual abuse against Bishop Jakes, the November 3 Larry Reid Live broadcast also includes the following specific statements by Youngblood about Bishop Jakes:<sup>15</sup>

- When it comes to Bishop Jakes. When I was sharing the story the other day this, I, I'm just running through the story, but I want to make sure people are very clear. I said that we were sitting at a dining room table and I looked at my watch and said I've got to get up and get out of here because I've got to get my mother's car back to her. But what may have been misunderstood is that Bishop Jakes got up, came around that table, and positioned himself in the corner that I had to walk past. When I was walking past that corner, he grabbed me. There is no reason if you're going to just give me a hug as we're leaving, go to the door with me and let's hug it out and let me go out the door. We are not at the door, we are still in the dining room, and he is in the corner, grabbed me to himself, looked down into my face, and then tried to bend his head down to kiss me on my lips. That is not a "you didn't get what you wanted to get." When I got home that next day, what I learned by Bishop Jakes's phone call to me was what he thought of me. Because he said there's three things that I need you to do, without hesitation. There's no long build up or nothing. So it tells me that the conversation that I had with him, his observation of me, made him believe that what he was getting ready to share, I would go with it. That means he had thoughts about my sexuality, my identity, all of those things before he even made the suggestion. And so he suggested to me, one, you're gonna be the only person

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<sup>15</sup> November 3 [LRL Episode](#).

I'm going to have sex with when I come to Pittsburgh, two, you can't sleep with nobody else because I can't give this to my wife, and three, I'm going to take care of you the rest of your life. To me, that is absolutely forcing your position your idea on to the person.

54. The full interviews were posted to the Larry Reid Live YouTube and Facebook accounts, and to the larryreidlive.com website. Clips of the interviews featuring Youngblood's accusations of grooming, sexual abuse, sexual assault, and other predatory conduct were also posted to the Larry Reid Live YouTube, Facebook, TikTok and Instagram accounts. All of these posts went out to a worldwide audience and were viewed hundreds of thousands of times.

55. Youngblood's statements were of and concerning Bishop Jakes.

56. Youngblood's statements on the October 28 and November 3 episodes of Larry Reid Live individually and taken as a whole, intended to convey, and were understood by viewers as conveying, the factual accusations that Bishop Jakes groomed, sexually abused, sexually assaulted, and engaged in predatory conduct of a sexual nature with Youngblood.

57. Youngblood's statements on the October 28 and November 3 episodes of Larry Reid Live are false and defamatory.

58. Youngblood's statements on the October 28 and November 3 episodes of Larry Reid Live are libelous per se in that they expose Bishop Jakes to contempt, ridicule, and obloquy, tends to affect Bishop Jakes in his profession as a trusted pastor and religious figure, and accuses Bishop Jakes of engaging in unlawful conduct. Indeed, the accusations that Youngblood has made about Bishop Jakes are as damaging and damning as anyone can make about a prominent pastor and spiritual leader.

59. By publication of his statements on the October 28 and November 3 episodes of Larry Reid Live, Youngblood caused harm to Bishop Jakes's reputation.



60. Youngblood published his statements on the October 28 and November 3 episodes of Larry Reid Live with actual malice, in that he was aware at the time of publication that the statement was false or, at a minimum, had a high degree of awareness that the statement was probably false.

61. In addition to knowing his statements were false when he made them—because he was a first-hand witness to his interactions with Bishop Jakes and knows that he was never groomed, sexually assaulted, sexually abused, or preyed on in any way by Bishop Jakes—Youngblood’s statements were also made with a reckless disregard of the truth, for example:

- Youngblood had financial and other motives to lie, as evidenced by his demand for millions of dollars from Bishop Jakes and his attempt to rehabilitate his image and recast himself as a sexual abuse victim instead of a perpetrator in order to revive his ministry;
- Youngblood is a convicted felon and sex offender;
- Youngblood’s claims are inherently improbable, in particular his claims about the follow-up conversations with Bishop Jakes;
- Youngblood’s false and defamatory statements about Bishop Jakes were made in furtherance of and to fit within the preconceived storyline Youngblood needed in order to rehabilitate his image as a sex offender and felon and to demand and extract millions of dollars from Bishop Jakes;
- Youngblood was caught red-handed lying about the circumstances of his criminal convictions during his October 28 interview with Larry Reid, and in his demand letter when he changed his story to be that he may have been 17 (rather than 18 or 19) at the time of the alleged incident; and
- Youngblood conspired and coordinated with others to levy these false attacks on Bishop Jakes.

62. Youngblood had no applicable privilege or legal authorization to make these false and defamatory statements, or if he did, he abused it.

63. As a direct and proximate result of the publication of his false and defamatory statements on the October 28 and November 3 episodes of Larry Reid Live, Bishop Jakes has suffered substantial injury to his reputation.

64. Youngblood's defamatory statements were accompanied with malice, wantonness, and a conscious desire to cause injury. Youngblood purposefully made the defamatory statements heedlessly and with reckless and willful indifference to Bishop Jakes's rights.

65. Bishop Jakes is therefore entitled to actual, presumed, punitive, and other economic damages in an amount to be specifically determined at trial.

### **SECOND CLAIM FOR RELIEF**

#### **CIVIL CONSPIRACY AGAINST ALL DEFENDANTS**

66. Bishop Jakes repeats, realleges, and incorporates the above paragraphs as though fully set forth herein.

67. On information and belief, Youngblood and those acting in concert with him (*i.e.*, the co-conspirators) worked together to publish and broadcast the false claim that Bishop Jakes groomed him and sexually assaulted Youngblood on a podcast reaching over 100k persons knowing that making such false claims on a podcast that reaches such a broad audience of listeners would harm Bishop Jakes. To wit, co-conspirator #1 falsely claimed, in sum and substance, during the podcast that Bishop Jakes had engaged in settlement discussions with Youngblood regarding his claims.

68. On information and belief, this statement by co-conspirator #1 was done intentionally in order to give credence and a patina of credibility to Youngblood's false statements, even though co-conspirator #1 was aware that efforts by Bishop Jakes to pay Youngblood to avoid him making such statements was knowingly false.

69. The first podcast occurred on October 28, 2024. While Youngblood and his co-conspirators made false statements to harm Bishop Jakes in that broadcast, on information and belief, the Defendants aimed to maximize their efforts by launching a second broadcast on November 3, 2024 meant to sharpen and clarify the false statements for maximum impact. For example, Youngblood, in sum and substance, attempted to more clearly target his false claim of sexual assault against Bishop Jakes by stating, in sum and substance, that Bishop Jakes restrained him and forcibly kissed him, as opposed to the first podcast interview where Youngblood alleges that they embraced at the end of an hours long, wide ranging conversation about faith and life and parents.

70. Due to Youngblood and his co-conspirators' defamatory acts, Bishop Jakes has suffered general and specific damages in amount to be established at trial.

71. On information and belief, Youngblood alleges that Defendants, and each of them, have committed defamatory acts, and/or acts in furtherance of, against Bishop Jakes, as alleged above, which were willful, intentional and malicious, which subjects Defendants, and each of them, to liability.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff Bishop T.D. Jakes respectfully requests that the Court award him relief against Defendant Duane Youngblood as follows:

72. Actual and compensatory damages exceeding \$75,000, as well as interest, reasonable attorneys' fees, and costs, as allowed by law;

73. Punitive damages, as allowed by law; and

74. Such other and further relief as the Court deems appropriate.

**JURY TRIAL DEMAND**

Plaintiff demands trial by jury for all claims and issues that are so triable.

Date: November 25, 2024

By /s/ Devin J. Chwastyk  
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